

December 21, 2010

Rhiannon Magruder  
Assistant Branch Chief  
Reports Analysis Division  
Federal Election Commission

Dear Ms. Magruder,

The American Action Network is making this submission in response to your four letters dated November 16, 2010.

Your letter referring to ?FEC Form 9 Filing (9/30/10 ? 10/1/10), received 9/30/10? indicates that the filing is missing information regarding the date of public distribution and title of the electioneering communication associated with the filing as well as information regarding the address, employer, and occupation of the Custodian of Records of the American Action Network. The American Action Network amended this filing electronically on December 20, 2010, to include this information.

Your letter referring to ?Amended FEC Form 9 Filing (8/20/10 ? 8/24/10), received 10/19/10? indicates that the filing is missing information regarding the address and occupation of the Custodian of Records of the American Action Network. The American Action Network amended this filing on December 20, 2010, to include this information. Because the original filing was not filed through the electronic filing process, this amendment had to be filed by fax to the attention of Ken Lally, FEC Technical Support, at 202.219.0674.

Your letter referring to ?Amended FEC Form 9 Filing (10/8/10 ? 10/12/10), received 10/18/10? indicates that the filing is missing the communication date on Schedule 9-B. However, this appears to be the result of a technical problem on the part of the FEC when it converted this electronically filed report to an image. When the report is viewed on the FEC?s electronic filing database (<http://query.nictusa.com/cgi-bin/dcdev/forms/C30001648/504159/f93>), the communication date is included on the Schedule 9-B. However, when the report is viewed on the FEC?s image database (Image # 10931552709) the communication date is not included on the Schedule 9-B.

Your letter referring to ?FEC Form 9 Filings, received 10/14/10? states that those filings require additional information and requests that the American Action Network amend those filings. As explained by the American Action Network in its 10/15/10 and 10/18/10 Miscellaneous Reports to the FEC (Image # 10931525001 and 10931551936): (1) the American Action Network filed amendments to those reports on 10/16/10 which included the additional information sought by your letter; and (2) the online filing program did not permit the American Action Network to designate the reports as ?Amended,? but required that they be filed as ?New.? Accordingly, the ?Amended? reports sought by your letter were filed as ?New? reports two days after the original reports were filed and included the additional information requested by your letter.

Please note that the technical problem discussed earlier regarding disclosure of the communication date on Schedule 9-B appears to have occurred with the 10/16/10 reports too. The 10/16/10 reports were filed electronically and when they are viewed on the FEC?s electronic filing database, they include the communication date on Schedule 9-B. However, when the reports are viewed on the FEC?s image database, the communication date is not included on the Schedule 9-B.

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